



February 21, 2013  
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: 1st Point Communications, LLC**  
**EB Docket No. 06-36; CY2012**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2012 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of 1st Point Communications, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to [stthomas@tminc.com](mailto:stthomas@tminc.com). Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas

Consultant to 1st Point Communications, LLC

cc: Erik Levitz, 1<sup>st</sup> Point Communications, LLC  
file: 1<sup>st</sup> Point Communications, LLC - FCC - Other  
tms: FCx1301

Enclosures  
ST/im

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification	Covering calendar year 2012
Name of company(s) covered by this certification:	1stPoint Communications, LLC
Form 499 Filer ID:	829392
Name of signatory:	Erik B. Levitt
Title of signatory:	Chief Executive Officer

1. I, Erik B. Levitt, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.
3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
\_\_\_\_\_  
Erik B. Levitt, Chief Executive Officer

2/15/2017  
\_\_\_\_\_  
Date

**Attachments:**      Accompanying Statement explaining CPNI procedures

**Attachment A**  
**Statement of CPNI Procedures and Compliance**

## **1stPoint Communications, LLC**

### **Statement of CPNI Procedures and Compliance**

1stPoint Communications, LLC (“1stPoint” or “the Company”) is predominantly a wholesale provider of VOIP services, with a limited number of retail VOIP customers. The Company does not use or permit access to CPNI to market any telecommunications or non-telecommunications services and has trained its personnel not to use CPNI for marketing purposes. Should 1stPoint elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

1stPoint has processes to safeguard its customers’ CPNI from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. The data is maintained on secure servers with security authentication in place (usernames and strong passwords) behind firewalls. The Company does not disclose CPNI over the telephone or online. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

1stPoint has processes in place to immediately notify its retail customers whenever a change is made to the customer’s account without revealing the changed information or sending the notification to the new account information. Customer data is available only to the customer online and is not revealed in the notifications.

1stPoint does not have any retail locations and therefore does not disclose CPNI instore.

The Company has in place procedures to notify law enforcement in the event of a breach of customers’ CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC’s rules, or, if applicable, when so authorized by law enforcement. Although there have been no breaches to report to date, the Company has a process in place to maintain records of any breaches discovered and notifications made to the USSS and the FBI, and to customers, for at least two years, consistent with FCC rules.

1stPoint has not taken any actions against data brokers in the last year.

1stPoint did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2012.

1stPoint has not developed any information with respect to the processes pretexters are using to attempt to access CPNI.